IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

CHRISTINE BIROS,

Case No. 17 CJ 04886

Plaintiff.

VS.

U LOCK INC.'S MOTION TO CORRECT AND/OR STRIKE ERRONEOUS CAPTION

U LOCK INC.

Defendant.

Filed on behalf of:

U LOCK INC., Defendant.

Counsel of record for this party:

J. Allen Roth, Esq. (PA 30347) 805 S. Alexandria Latrobe PA 15650 (724) 537-0939 lawmatters@yahoo.com

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IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

CHRISTINE BIROS,)	Case No. 17 CJ 04886
Plaintiff,)	
vs.)	
U LOCK INC.,)	
Defendant.)	

DEFENDANT U LOCK INC.'S MOTION TO CORRECT AND/OR STRIKE ERRONEOUS CAPTION.

Defendant U Lock Inc., by and through its counsel, J. Allen Roth, files this Motion to Correct and/or Strike Erroneous Caption:

- 1. At the hearing on April 29, 2022, this Court directed U Lock and its counsel to file a motion and proposed Order to correct the caption in this case.
- 2. Defendant and counsel apologize for the confusion as it occurred simply because a prior template was used. Counsel notes that it did not occur as to the filings on April
- 3. Defendant notes that the Prothonotary's docket also shows all of the parties to the case notwithstanding the amendment of the caption. See Docket Sheet, attached. It is up to this Court whether to direct the Prothonotary to modify the docket sheet.

WHEREFORE, Defendant U Lock respectfully requests that this Court enter the appropriate Order as directed.

Respectfully submitted,

J Allen Roth, Esq (PA 30347)

805 S Alexandria Street Latrobe PA 15650

(724) 537-0939

lawmatters@yahoo.com

ATTORNEY FOR U LOCK INC.

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PENNSYLVANIA

CHRISTINE BIROS,)	Case No. 17 CJ 04886
Plaintiff,)	
vs.)	
U LOCK INC.,)	
Defendant.)	

ORDER

AND NOW, this ____ day of May, 2022, upon the consent of the defendant and the motion to correct or strike, it is hereby ORDERED, ADJUDGED, and DECREED that the Prothonotary is directed to strike off the reference in the caption on the filings of U Lock on March 17, 2022 (Motion to Strike and Exhibits in Support) as to parties other than Christine Biros and U Lock Inc.

By the Court:	
Judge, Court of Common Pleas	

EXHIBIT A - TEXT OF PROTHONOTARY DOCKET FOR THE CASE

Case Information

Case# Caption Reference File Judgment Amt Filed Date Case

Type/Subtype Status Judge

17CJ04886 CHRISTINE BIROS /INDIVID VS. U LOCK INC

Jan/24/2018 LIS PENDENS NEW FILE ACTIVE Rita Donovan Hathaway Parties

Party Type Name Address

DEFENDANT ATTY DENNIS D DEL COTTO 4345 OLD WILLIAM PENN HWY,

MURRYSVILLE, PA, 15668

DEFENDANT ATTY J ALLEN ROTH 805 S ALEXANDRIA STREET, LATROBE , PA, 15650

DEFENDANT ATTY JOHN A TUMOLO 437 GRANT STREET, PITTSBURGH, PA, 15219

DEFENDANT DENISE SCHUR /EXEC 8700 CLEVELAND ROAD, CRESTON, OH, 44217, USA

DEFENDANT ALEX SCHUR /ESTATE

PLAINTIFF ATTY WILLIAM E OTTOPO BOX 701, MURRYSVILLE, PA, 15668

PLAINTIFF CHRISTINE BIROS /INDIVID 435 MILLERS LANE, PLUM, 15239 DEFENDANT

HENRY L MOORE /CO EXEC 310 KEYSTONE COMMONS 35

WEST PITTSBURGH STREET, GREENSBURG, PA, 15601, USA

DEFENDANT SUSAN STANO /CO EXEC 31856 LAKE DRIVE, AVON LAKE, OHIO, 44012, USA

DEFENDANT NICHOLAS SCHUR /ESTATE

DEFENDANT KATHLEEN S WALTER /EXEC 3 RIDGE COURT, SARATOGA

SPRINGS, NY, 12866, USA

DEFENDANT MICHAEL SCHUR /ESTATE

DEFENDANT CYNTHIA SARRIS /ADMIN 14249 HILAND PLACE, IRWIN, PA, 15642, USA

DEFENDANT ANN SARRIS /ESTATE

DEFENDANT U LOCK INC 14140 ROUTE 30, NORTH HUNTINGDON, PA, 15642, USA

Events

Action Date Action Description Action Name View Document

Apr/25/2022 BRIEF IN OPPOSITION TO MOTION FOR SANCTIONS View Apr/21/2022 PRELIMINARY OBJECTIONS DEFT U LOCK INCS PRELIMINARY OBJECTIONS RAISING ISSUES OF FACT TO THE PETITION FOR WRIT OF POSSESSION View

Mar/18/2022 ORDER PENDING SUPRME COURT OF PA WESTERN DISTRICT View

Mar/17/2022 EXHIBITS IN SUPPORT OF PETITION TO STRIKE ORDER OF JANUARY 20 2022 AS SET FORTH View

Mar/17/2022 MOT/PET STRIKE PETITION TO STRIKE ORDER OF JAN 20 2022 AS SET FORTHView

Jan/24/2022 ORDER ORDER JANUARY 20, 2022 NOTICE GIVEN RULE N236 View

CERTIFICATE OF SERVICE

I certify that I mailed a true copy of the foregoing to the following parties on this 12th day of May. 2022:

William E. Otto, Esq. PO Box 701 Murrysville, PA 15668

Dennis D. Del Cotto, Esq. (courtesy only) 4345 Old William Penn Highway Murrysville, PA 15668

William F. Ross, Esq. (courtesy only) 406 N. Market Street Wooster, OH 44691

John Tumolo, Esq. (courtesy only) Suite 1500, Frick Building Pittsburgh, PA 15219

Hon. Harry F. Smail Court of Common Pleas 2 N Main Street, Courtroom 2 Greensburg PA 15601

J. Allen Roth, Esq.

J. Sledod